

EXHIBIT 2



GEORGE E. WARNER, JR.
CREDITORS' RIGHTS SPECIALIST
CERTIFIED BY THE AMERICAN BOARD OF CERTIFICATION
GEORGE@WARNERLAWMN.COM

October 12, 2022

VIA ODYSSEY E-FILING SYSTEM

Ramsey County Government Center
Attn: Court Administration
15 West Kellogg Boulevard
Saint Paul, Minnesota 55102

Re: *Minnesota Life Insurance Company v. Matthew F. Strong and Strong Financial Solutions*
Ramsey County Court File: _____ | Our File: 3458:00015

Dear Court Administrator:

Attached for filing, please find the following:

1. Summons and Complaint;
2. Affidavit of Service on Matthew Strong;
3. Affidavit of Service on Strong Financial;
4. Plaintiff's Civil Cover Sheet;
5. Affidavit of Mailing.

The Plaintiff is respectfully requesting that a judge be formally assigned to this case. The Plaintiff is bringing on various proceedings requiring the assignment of a judicial officer.

WARNER LAW, LLC
/s/ George E. Warner, Jr.
Attorney at Law

GEW/kf
Enclosures as Stated
cc: Client (via e-mail; w/enc.)
Defendants (via U.S. Mail; w/enc.)

STATE OF MINNESOTA
COUNTY OF RAMSEYDISTRICT COURT
SECOND JUDICIAL DISTRICT

Minnesota Life Insurance Company

Plaintiff,

Court File Number

vs.

Matthew F. Strong and Strong Financial Solutions, Inc.
Defendants,

AFFIDAVIT OF SERVICE

State of Florida }
County of Palm Beach } SSI, THOMAS MCGOLDRICK, state that on
(Name of Server)10 / 6 / 2022 at 7:06 P.M. I served the:
(Date of Service) (Time of Service)

Summons; Complaint; Creditor's Affidavit and Verification; Exhibits

upon: Matthew F. Strong

therein named, personally at: Apt. 1106
1200 Hibiscus Avenue
Pompano Beach, FL 33062

by handing to and leaving with:

- ☒ Matthew F. Strong
☐ a person of suitable age and discretion then and there residing at the usual abode
of said, Matthew F. Strong

(Name of the Person with whom the documents were left)

(Title or Relationship)

a true and correct copy thereof.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minnesota Statute § 358.116.

Dated: 10 / 7 / 2022Thomas McGoldrick SPS#1563
(Signature of Server)THOMAS MCGOLDRICK SPS#1563
(Printed Name of Server)

* Service was completed by an independent contractor retained by Metro Legal Services, Inc.



Serial # WARLA2 270049 1281

Re: 3458:00015


METRO LEGAL
legal support specialists since 1969616 South 3rd Street
Minneapolis, MN 55415
(800) 488-8994
www.metrolegal.com

STATE OF MINNESOTA
COUNTY OF RAMSEYDISTRICT COURT
SECOND JUDICIAL DISTRICT

Minnesota Life Insurance Company

Plaintiff,

Court File Number

vs.

Matthew F. Strong and Strong Financial Solutions, Inc.
Defendants,

AFFIDAVIT OF SERVICE

State of Florida }
County of Palm Beach } SSI, THOMAS MCGOLDRICK, state that on
(Name of Server)10 / 6 /2022 at 7:06 P M, I served the:
(Date of Service) (Time of Service)

Summons; Complaint; Creditor's Affidavit and Verification; Exhibits

upon: Strong Financial Solutions, Inc.

therein named, personally at: Apt. 1106
1200 Hibiscus Avenue
Pompano Beach, FL 33062

by handing to and leaving with:

- ☒ the Registered Agent of Strong Financial Solutions, Inc.
☐ an Officer of Strong Financial Solutions, Inc.
☐ a Managing Agent, someone within Strong Financial Solutions, Inc. whose management capacity is such that (s)he exercises independent judgment and discretion

MATTHEW STRONG
(Name of the Person with whom the documents were left)REGISTERED AGENT
(Title or Relationship)

a true and correct copy thereof.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minnesota Statute § 358.116.

Dated: 10 / 7 /2022Thomas McGoldrick SPS# 1563
(Signature of Server)THOMAS MCGOLDRICK SPS# 1563
(Printed Name of Server)

* Service was completed by an independent contractor retained by Metro Legal Services, Inc.



Serial # WARLA2 270050 1282

Re: 3458:00015

METRO LEGAL
legal support specialists since 1909616 South 3rd Street
Minneapolis, MN 55415
(800) 488-8994
www.metrolegal.com

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Minnesota Life Insurance Company, Plaintiff, v. Matthew F. Strong and Strong Financial Solutions, Inc., Defendants.	Case Type: Contract Court File No. Unassigned Civil Cover Sheet (Non-Family Case Type)
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Date Case Filed: October 12, 2022

This civil cover sheet must be filed by the initial filing lawyer or party, if unrepresented by legal counsel, unless the court orders all parties or their legal counsel to complete this form. Once the initial civil cover sheet is filed, opposing lawyers or unrepresented parties who have not already been ordered to complete this form may submit their own cover sheet within ten days after being served with the initial cover sheet. See Rule 104 of the General Rules of Practice for the District Courts.

If information is not known to the filing party at the time of filing, it shall be provided to the Court Administrator in writing by the filing party within seven (7) days of learning the information. Any party impleading additional parties shall provide the same information to the Court Administrator. The Court Administrator shall, upon receipt of the completed certificate, notify all parties or their lawyers, if represented by counsel, of the date of filing the action and the file number assigned.

ATTORNEYS FOR PLAINTIFF

George E. Warner, Jr. (#0222719)
WARNER LAW, LLC
120 South Sixth Street, Suite 1515
Minneapolis, Minnesota 55402-1817
Telephone (952) 922-7700
george@warnerlawmn.com

Dated: October 12, 2022

DEFENDANTS, unrepresented

Matthew F. Strong
1200 Hibiscus Avenue, Apt. 1106
Pompano Beach, Florida 33062

Strong Financial Solutions, Inc.
1200 Hibiscus Avenue, Apt. 1106
Pompano Beach, Florida 33062

1. Provide a concise statement of the case including facts and legal basis: Plaintiff brought this collection action to recover sums owed by Defendants.
2. Date Complaint was served: October 6, 2022
3. For Expedited Litigation Track (ELT) Pilot Courts only: Not Applicable.
 - a. ☐ the parties jointly and voluntarily agree that this case shall be governed by the Special Rules for ELT Pilot. Date of agreement: _____
 - b. ☐ The court is requested to consider excluding this case from ELT for the following reasons: _____
 - c. Anticipated number of trial witnesses: three (3).
 - d., e., f. Medical expenses, lost wages and subrogation interests are: Not Applicable.
4. Estimated discovery completion within six (6) months from the date of this form.
5. Disclosure of electronically stored information discussed with other party? No.
6. Proposed trial start date: October 16, 2023
7. Estimated trial time: one (1) day.
8. Jury trial is ☒ waived by consent of Plaintiff pursuant to Minn. R. Civ. P. 38.02.
9. Physical/mental/blood examination pursuant to Minn. R. Civ. P. 35 is Not Applicable.
10. Identify any party/witness requiring interpreter services: None known at present.
11. Issues in dispute: Recovery of sums owed by Defendants to Plaintiff.
12. Case Type / Category: Contract.
13. Alternative Dispute Resolution (ADR): The Plaintiff respectfully requests the Court excuse the parties from mandatory ADR under General Rule of Practice 114.04(b).

The attorney signing below certifies that the above information is true and correct.

Dated: October 12, 2022

WARNER LAW, LLC
/s/ George E. Warner, Jr.
George E. Warner, Jr. (#0222719)
120 South Sixth Street, Suite 1515
Minneapolis, Minnesota 55402-1817
Telephone (952) 922-7700

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Minnesota Life Insurance Company,

Plaintiff,

vs.

Matthew F. Strong and
Strong Financial Solutions, Inc.,

Defendants.

Case Type: Contract
Court File No. Unassigned**AFFIDAVIT OF SERVICE**

I hereby certify that on October 12, 2022 I served the Plaintiff's Civil Cover Sheet on the parties below via the method indicated:

VIA FIRST CLASS U.S. MAIL

Matthew F. Strong
Strong Financial Solutions, Inc.
1200 Hibiscus Avenue, Apt. 1106
Pompano Beach, Florida 33062

Under the provisions of Minn. Stat. § 358.116 and Minnesota General Rules of Practice 14 and 15(b), I declare under penalty of perjury that everything I have stated in this document is true and correct.

WARNER LAW, LLC

Dated: October 12, 2022

/s/ Kristen N. Franklin
Kristen N. Franklin, Paralegal
120 South Sixth Street, Suite 1515
Minneapolis, Minnesota 55402-1817
Telephone (952) 922-7700

62-CV-22-5535



120 SOUTH SIXTH STREET
SUITE 1515
MINNEAPOLIS, MN 55402

Matthew F. Strong
Strong Financial Solutions, Inc.
1200 Hibiscus Avenue, Apt. 1106
Pompano Beach, Florida 33062

Filed in District Court
State of Minnesota
10/12/2022 2:01 PM



State of Minnesota
Ramsey County

District Court
Second Judicial District

Court File Number: **62-CV-22-5535**

Case Type: Contract

FILE COPY

**Notice of Case Filing and
Assignment**

Minnesota Life Insurance Company vs Matthew F. Strong, Strong Financial Solutions, Inc.

Date Case Filed: **October 12, 2022**

Court file number **62-CV-22-5535** has been assigned to this matter. All future correspondence must include this file number, the attorney identification number, and must otherwise conform to format requirements or they WILL BE RETURNED. Correspondence and communication on this matter should be directed to the following court address:

**Ramsey County Court Administration
15 West Kellogg Boulevard Room 170
St Paul MN 55102**

Assigned to: **Judge Laura Nelson**

If ADR applies, a list of neutrals is available at www.mncourts.gov (go to Alternative Dispute Resolution) or at any court facility. Please direct all scheduling inquiries on this matter to Assignment at 651-266-8306.

Dated: October 13, 2022

Michael F. Upton
Court Administrator
Ramsey County District Court

cc: Matthew F. Strong
Strong Financial Solutions, Inc.
GEORGE EDWARD WARNER